



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 500
DENVER, CO 80202-2466

FEB 10 1999

Ref: 8EPR-EP

Jerry Schmidt, Forest supervisor
Medicine Bow - Routt National Forests
2468 Jackson Street
Laramie, Wyoming 82070-6535

Re: South Fork Salvage Analysis Draft
Environmental Impact Statement

Dear Mr. Schmidt:

In accordance with our responsibilities under the National environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the referenced project Draft Environmental Impact Statement (DEIS). We offer the following comments and concerns for your consideration in preparation of the Final Environmental Impact Statement (FEIS).

We understand the South Fork Salvage Analysis DEIS is a portion of an action plan the Forest Service developed in response to a serious blowdown in October of 1997. The EPA has previously reviewed and commented on the initial EIS for the action plan that covered the adjacent North Fork Salvage Analysis. The South Fork Salvage Analysis DEIS is tiered to the North Fork Salvage Analysis FEIS.

Using conventional ground-based logging methods, the proposed action would result in commercial salvage of primarily spruce-fir stands on approximately 423 acres. In addition, one stand of trees, approximately 73 acres, has been identified for thinning in order to attempt to increase the resistance of that stand to attack by spruce beetles. Alternative B, the preferred alternative, proposes to construct 1.9 miles of new specified roads and an additional 2.9 miles of temporary roads.

Discussion in Section 3.6.2 EXISTING CONDITION - FISHERIES & HYDROLOGY and Section 4.6 EFFECTS TO FISHERIES AND HYDROLOGY provide an adequate narrative of the watersheds and streams in the analysis area. However, we were unable to find a map showing the location of these watersheds and streams to the proposed Harvest Units. While we understand that Alternative B proposes selective salvage operations affecting only 25 riparian acres in streamside management zones (SMZs), it would be most helpful if the FEIS were to include a watershed map showing location of affected streams and where on Reed Creek the riparian harvest would occur.



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Our primary concerns with the preferred alternative and its attendant silviculture activities are related to hydrologic and sediment issues. The South Fork Analysis Area (SFAA) covers approximately 17,507 acres which includes portions of the lower South and Middle Forks of the Elk River and the Reed Creek basin. None of the water bodies in the SFAA are presently listed on the 1998 303(d) list. Alternative B would disturb 423 acres, in a number of harvest units, related to timber salvage and harvest and an additional 4.8 miles of specified and temporary roads. Total disturbance appears to be a relatively small portion of the SFAA.

Discussion on pages 4-9 through 4-13 seems to minimize sedimentation concerns due to the location of new road construction and silviculture activities relative to their proximity to riparian and stream areas. Additional discussion on page 4-11 of the role large woody debris (LWD) plays in the natural hydrologic process is most helpful in understanding a portion of the dynamics of the SMZ. However, disclosure on page 4-10 that there will be reconstruction actions in the Floyd Peak area on Forest Roads 441 and 441.b requires additional discussion. What impacts can be anticipated from the reconstruction of culverts at "several" locations and from pre-haul maintenance of existing roads? Also, discussion related to impacts of road reconstruction along Reed Creek needs to be expanded. We were unable to find any other discussion related to road reconstruction or to the probable number of miles that would need to be constructed.

We support the implementation of mitigation measures, the use of Best Management Practices (BMPs) and the Design Criteria in the Watershed Conversations Practices Handbook (FSH 2509.25) as a means to reduce watershed impacts. In addition, we feel there is a need to design and implement an in-stream monitoring program, such as T-WALK and biological monitoring, to document how well the BMPs are meeting the Clean Water Act requirements.

Discussion on page 4-34 reveals that —"Streamside Management Zones (SMZ) will provide linkages between forest patches and corridors for species needing woody debris cover for movement through the landscape." Please provide a discussion of the location of the road in relation to Reed Creek. Is it located adjacent to the creek in what is considered an SMZ? If so, can it be obliterated after salvage harvest and the habitat restored? We understand that all new roads will be gated and will not be available for motorized public use once salvage is completed.

Air Quality environmental impacts are discussed briefly on pages 4-1 and 4-2. Despite the relatively small area in the SFAA to be disturbed, it can be anticipated that due to a short logging season free of snow and runoff, logging efforts will be fairly intense. Since the Mount Zirkel Wilderness is immediately adjacent to some of the logging activity, is there a need to model road dust, vehicle emissions and logging activities which may affect wilderness air quality and visibility?

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the EPA Region VIII rates this DEIS as Category EC-2. This means that additional information, as noted, would allow us to more fully assess proposed action environmental impacts. A copy of our rating criteria is attached.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."